

PAUL HASTINGS

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December 20, 2021

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VIA ECF

Clerk of Court
U.S. Courthouse, Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Ulku Rowe v. Google LLC*, No. 19-cv-08655 (LGS)

Dear Clerk of Court:

We represent Google LLC in the above-referenced matter. On November 1, 2021, Google filed a motion for summary judgment as to Plaintiff Ulku Rowe's claims. (ECF 137.) In support of that motion, Google submitted several exhibits containing excerpts of certified deposition transcripts attached to the Declaration of Sara B. Tomezsko ("Tomezsko Declaration"). (ECF 143.) Google used the full-sized version of the deposition transcripts. On December 6, 2021, Plaintiff filed her opposition to Google's motion and cross-motion for partial summary judgment. (ECF 152.) In support of that motion, Plaintiff submitted pages from the minu-script version of deposition transcripts attached to the Declaration of Maya S. Jumper. (ECF 160.)

Given the Court's limitations on the number of pages parties may submit as exhibits in support of their motions, and given Plaintiff's use of minu-script versions of relevant depositions, Google hereby submits corrected copies of the exhibits to the Tomezsko Declaration replacing the full-size versions of the following exhibits with minu-script versions:

- Tomezsko Declaration, Exh. 1 (ECF 143-1) – October 14, 2020 and February 23, 2021 transcripts of depositions of Plaintiff Ulku Rowe (corrected minu-script version of previously submitted pages attached to this letter as Exh. 1)
- Tomezsko Declaration, Exh. 2 (ECF 143-2) – October 29, 2020 transcript of deposition of Will Grannis (corrected minu-script version of previously submitted pages attached to this letter as Exh. 2)
- Tomezsko Declaration, Exh. 3 (ECF 143-3) – October 15, 2020 transcript of deposition of Tariq Shaukat (corrected minu-script version of previously submitted pages attached to this letter as Exh. 3)
- Tomezsko Declaration, Exh. 4 (ECF 143-4) – October 2, 2020 transcript of deposition of Adam Leif (corrected minu-script version of previously submitted pages attached to this letter as Exh. 4)
- Tomezsko Declaration, Exh. 5 (ECF 143-5) – October 27, 2020 transcript of deposition of Kevin Lucas (corrected minu-script version of previously submitted pages attached to this letter as Exh. 5)

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- Tomezsko Declaration, Exh. 6 (ECF 143-6) – December 9, 2020 transcript of deposition of Jennifer Burdis (corrected minu-script version of previously submitted pages attached to this letter as Exh. 6)
- Tomezsko Declaration, Exh. 7 (ECF 143-7) – November 17, 2020 transcript of deposition of Stuart Vardaman (corrected minu-script version of previously submitted pages attached to this letter as Exh. 7)
- Tomezsko Declaration, Exh. 8 (ECF 143-8) – December 3, 2020 transcript of deposition of Evren Eryurek (corrected minu-script version of previously submitted pages attached to this letter as Exh. 8)
- Tomezsko Declaration, Exh. 9 (ECF 143-9) – December 2, 2020 transcript of deposition of Benjamin Wilson (corrected minu-script version of previously submitted pages attached to this letter as Exh. 9)

Counsel has removed from the corrected exhibits any portions not originally submitted to the Court in support of Google's motion for summary judgment on November 1, 2021. Google is not seeking to submit the removed pages for the Court's consideration under seal; rather, the pages have been removed to make clear that the content has *not* been submitted for the Court's consideration, and to avoid any suggestion that Google is submitting additional evidence in support of its November 1, 2021, filing after-the-fact. Any actual redactions made to the content of these corrected exhibits are the same redactions reflected in the corresponding full-sized versions filed on November 1, 2021, which are currently the subject of Google's pending motion to retain documents under seal. (ECF 144.)

Respectfully submitted,



Sara B. Tomezsko
for PAUL HASTINGS LLP

SBT:SBT

Attachments

cc: All counsel of record (via ECF)